

Hon. Franklin D. Burgess

08-CV-05166-STIP

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CAROL FREITAS,

Plaintiff

vs.

UNITED STATES POSTAL SERVICE,

Defendant

NO. C08-05166-FDB

STIPULATION MOTION
FOR EXTENSION OF
CERTAIN DEADLINES
AND ~~PROPOSED~~ ORDER

(Please note on motion calendar:
May 19, 2009)

Plaintiff, through her undersigned counsel, and defendant, through its undersigned counsel,
stipulate and agree as follows:

1. On September 22, 2008, this Court entered a scheduling order setting the deadlines
as follows:

-Disclosure of expert witnesses and their opinions by 4/20/2009.

-Disclosure of rebuttal experts and their opinions by 5/19/2009.

-Objection to Oppositions' Experts due by 6/18/2009.

-Discovery cut-off and filing date for amended pleadings is 6/29/2009.

-Counsel shall complete the mediation process and file a letter of compliance by 7/8/2009.

-All remaining motions, including DISPOSITIVE MOTIONS, shall be filed by 7/28/2009.

STIPULATION MOTION FOR
EXTENSION OF CERTAIN DEADLINES - 1

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1 -Filing of Trial Briefs, lodging of Proposed Findings of Fact and Conclusions

2 of Law and lodging the Proposed Pre-Trial Order is 9/24/2009.

3 -Pre-Trial Conference will be held on 10/2/2009 at 02:00 PM.

4 -TWO DAY Bench Trial is set for 10/26/2009 at 09:00 AM.

5 2. Defendant propounded discovery upon Plaintiff in February 2009, with Plaintiff's
6 responses due in March 2009. Due to trial schedule conflicts resulting from attorney for plaintiff
7 assuming the case load of deceased attorney Alvin D. Mayhew, Jr., Plaintiff has had difficulty in
8 responding to the discovery and as unable to do so until May 22, 2009. The parties have worked
9 amicably to resolve that difficulty, but the delay has intruded or will intrude on the orderly
10 compliance with the deadlines.

11 3. Therefore, the parties have conferred and hereby STIPULATE and respectfully
12 JOINTLY REQUEST that the Court enter the following order:

13 -Disclosure of expert witnesses and their opinions by 6/19/2009.

14 -Disclosure of rebuttal experts and their opinions by 7/20/2009.

15 -Objection to Oppositions' Experts due by 8/17/2009

16 -Discovery cut-off and filing date for amended pleadings is 8/28/2009.

17 -All remaining motions, including DISPOSITIVE MOTIONS, shall be filed by 9/24/2009.

18 -Counsel shall complete the mediation process and file a letter of compliance by 11/20/2009.

19 -Filing of Trial Briefs, lodging of Proposed Findings of Fact and Conclusions

20 of Law and lodging the Proposed Pre-Trial Order is 12/3/2009.

21 -Pretrial Conference set for 12/11/2009 at 02:00 PM in C Courtroom before Judge Franklin
22 D. Burgess.

23 -TWO DAY Bench Trial is set for 12/21/2009 at 09:00 AM.

1/05/2010
AB PL

1 So stipulated and respectfully submitted this 19th day of May, 2009, by:
2 Respectfully submitted,

3 JEFFREY C. SULLIVAN
4 United States Attorney

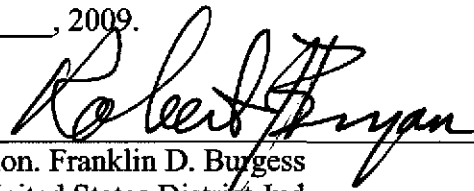
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20 [PROPOSED] ORDER

21 The parties having so stipulated, it is so ORDERED.

22 DATED this 22 day of May, 2009.

23 for 
24 Hon. Franklin D. Burgess
United States District Judge

STIPULATION MOTION FOR
EXTENSION OF CERTAIN DEADLINES - 3

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